



HARRIS COUNTY COMMUNITY FLOOD RESILIENCE TASK FORCE

Community Flood Resilience Task Force
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County Administrator David Berry and Interim Executive Director Alan Black,

The Community Flood Resilience Task Force (CFRTF) is pleased to provide you with our recommendations regarding the proposed revisions to the Prioritization Framework, as requested by Harris County Commissioners Court on December 14, 2021. We applaud the move of Commissioners Court to ensure the involvement of community voices and subject matter experts in service of the County's equitable flood resilience efforts.

In response to the request, the CFRTF created an Ad Hoc Committee to evaluate the proposed revisions with representatives of the Harris County Flood Control District (HCFCD), Office of the County Administrator (OCA) and the Infrastructure Resilience Team (IRT), which met on January 19 and February 2, 2022. The Ad Hoc Committee then presented their recommendations to the full CFRTF for a vote at a Special Meeting on February 8, 2022. All recommendations below were unanimously approved by CFRTF members, unless otherwise noted. The meetings were open to the public and integrated community feedback through verbal comments, in-meeting chat, and written comments submitted via email. A summary of these comments is provided in the appendix to this letter.

All of the following CFRTF recommendations are predicated on the following key priorities:

- Center people over buildings to describe the benefits of flood resilience projects
- Focus on County-specific priorities to allocate locally-controlled funding
- Promote overall resilience by implementing projects that reduce immediate flood risk for people while also implementing nature-based solutions that keep flooding from getting worse

- Ensure the metrics we're using advance equity, rely on best practices, and are as accurate as possible at this point in time

1. RECOMMEND USING PEOPLE TO MEASURE PEOPLE BENEFITED

The proposed Benefits Efficiency formula attempts to place greater emphasis on the number of people benefitted by a flood mitigation project. However, using the number of structures removed from the 1% event as a proxy for the number of people benefitted misses an opportunity to truly center the benefits of flood mitigation projects to people. As currently proposed, the Benefits Efficiency captures the cost effectiveness of a project to the County as dollar per structure, rather than capturing the benefits accrued to people. To shift this focus we recommend:

- Implement a formula to measure the number of people benefitted by a project. The CFRTF considered two methods that calculate people, including (i) utilizing census data for an area-weighted approach which would estimate benefits to all people within the project area regardless of multiple floors and (ii) utilizing HCAD data for a parcel-based approach which could differentiate between direct flood reduction benefits to the people on the first floor and partial benefits to people on upper floors. The CFRTF does not recommend one approach over another and instead provides the following guidance for HCFCD and the OCA.
- The formula should:
 - i. Be as simple as possible, with the fewest number of assumptions.
 - ii. Use the most recent and finest grain data possible to capture the number of people most accurately.
 - iii. Capture benefits for all people in the project area, including people on the first and upper floors.
- Lastly, the CFRTF feels that the proposed Benefits Efficiency metric focuses more on measuring cost efficiency rather than benefits, and we recommend that this formula keep its former name, "Project Efficiency."

2. RECOMMEND REMOVING COMMITTED PARTNERSHIP FUNDING FROM THE BENEFITS EFFICIENCY FORMULA.

The proposed Benefits Efficiency formula calculates the total cost to the County, subtracting the committed partnership funding from the total project cost. While we understand the intent of this calculation is to determine the reach of the County dollar, the Task Force believes the metric should focus on the project's overall cost efficiency, calculated only by the project's total cost per person benefitted, without factoring in partnership funding. To further support this recommendation, we note that utilizing committed partnership funds disadvantages projects that aren't able to successfully attain other forms of local, state, or federal funding and that the County should pursue projects that meet local needs rather than be restricted by partnership fund requirements.

There were two dissenting votes for this recommendation due to concerns that removing partnership funding from the equation could disincentivize the County from pursuing money from external sources. Therefore, while we recommend not including committed partnership funding in the formula, we are not recommending excluding external funds from project evaluation altogether. Instead, we encourage the County to continue to pursue as much partnership funding as possible until all projects are completed.

3. RECOMMEND ADJUSTMENTS TO THE ASSIGNED VALUES FOR PROJECTS WITHOUT DIRECT BENEFITS TO STRUCTURES IN THE BENEFITS EFFICIENCY METRIC

The 2018 Flood Bond included projects that move the County forward in overall resilience. These include projects with direct benefits to structures, as they reduce the flood risk of a structure in the floodplain, as well as projects that implement nature-based solutions, such as floodplain preservation. Projects such as floodplain preservation do not directly reduce flood risk to current structures but, in the long-term, typically prevent development that could result in flood risk to structures. The 2018 Flood Bond also includes projects such as stabilization and restoration of channels that further the District's operation and maintenance of infrastructure but that do not directly reduce flood risk to structures. In order to balance reducing flood risk for people with furthering resilience more broadly, we recommend that the framework prioritize projects that go beyond operations and maintenance and score the projects as follows:

- Lower the Benefit Efficiency scores for projects that fall under Wetland Mitigation Banks to a 1.
 - Wetland mitigation banks should be considered part of the District's operations and maintenance as these involve meeting the federal regulatory requirements of projects.
- Distinguish between types of Stabilization projects to add a Natural Channel Design classification, to be scored at a 6.
 - Standard stabilization projects fall under typical operations and maintenance of the District and should be scored low, but natural channel design is a nature-based solution that is prioritized in the Harris Thrives resolution and should be scored high.
- Keep the following scores as they are.
 - Stabilization projects that are maintenance-related scored at a 1.
 - Investigation projects scored at a 2.
 - Floodplain Preservation projects scored at a 7.

For future projects outside of the current 2018 bond program, the CFRTF recommends building operations and maintenance costs into the HCFCD budget, rather than listing them as separate projects to be ranked. However, the County should ensure adequate funding for the District so as to not create an operations and maintenance budget deficiency. The County should also work to clarify their goals regarding targets for direct flood risk reduction and nature-based solutions projects, and should consider that part of

the critical visioning process for the Flood Resilience Plan that builds upon the Harris Thrives resolution.

4. RECOMMEND A MORE RECENT RANGE OF DATA FOR THE LEVEL OF SERVICE PROXY

The proposed addition of the level of service proxy as a blended data set of FEMA claims since 1977 and windshield damage assessments after a declared disaster to measure the extent and frequency of flood damage is a step in the right direction to create an apples-to-apples comparison between channel and detention projects and subdivision drainage projects. While there is concern with utilizing the FEMA data, given the history of federal policies that unfairly burden, exclude, and therefore undercount the impact of disasters in low-income and minority populations, the addition of windshield damage assessments can supplement this data set and help correct for undercounted populations during a disaster. To a lesser extent, windshield damage assessments also underestimate the extent of damaged homes during an event, but the CFRTF recognizes that this blended data set is the best available data at this time.

Regarding the timeframe, using data from 1977 would not be a good proxy since much of Harris County was not developed at that time and windshield damage assessments were not being conducted at the time. Therefore, going back this far would not offer an accurate nor equitable picture. In order to ensure a more accurate proxy for frequency of flooding, we recommend:

- Use a more recent range of data, where both the FEMA claims and the County-wide windshield damage assessments are as accurate as possible.
- Change the term “level of service” to another phrase such as “frequency of flooding” that more accurately captures the intent of the proxy metric.

These recommendations focus on the use of the Prioritization Framework to rank the 2018 Flood Bond Projects for allocation of Flood Resilience Trust funds. We look forward to collaborating further with the OCA and HCFCD as they work to practically implement the recommendations posed here. Please reach out with any questions or points of clarification needed.

Going forward we need to develop a suite of tools, in addition to the Prioritization Framework, that Harris County can continue to evolve over time to conceive of and effectively evaluate projects for efficiency, equity, and impact. We recommend that HCFCD and the OCA begin working with the Task Force and the Infrastructure Resilience Team (IRT) within the next six (6) months on shaping future tools, one of which could be the Flood Mitigation Benefits Index (FMBI) that is currently in development between the Task Force and HCFCD. This work should also include developing a methodology for on-going re-scoring of projects as they move across the phases of the project life cycle and an evaluation of the efficacy of these tools in meeting the County’s resilience goals. Additionally, as the Commissioners Court is aware, it is estimated that our community will require upwards of \$60 billion to adequately mitigate flooding in Harris

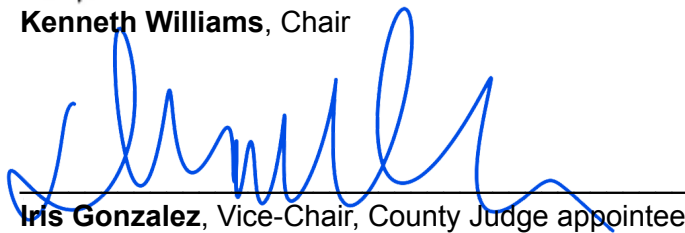
County. The challenge is massive and the County should start working now to identify funding sources that fully implement the coming 2050 Flood Resilience Plan.

Thank you for your leadership and commitment to equitable flood resilience in Harris County. We are honored to represent our communities and play an important role in these efforts and encourage County Judge Hidalgo and the Commissioners to continue to leverage our lived experience and subject matter expertise to move Harris County forward together.

Thank you,



Kenneth Williams, Chair



Iris Gonzalez, Vice-Chair, County Judge appointee



Yasmeen Dávila, Secretary

On behalf of the
Community Flood Resilience Task Force Members

Mashal Awais, Precinct 1 appointee
Lisa Gonzalez, Precinct 2 appointee
Bill Callegari, Precinct 3 appointee
Bob Rehak, Precinct 4 appointee
Adriana Tamez
Tracy Stephens
Mary Anne Piacentini
Elaine Morales-Díaz
Dr. Denae King
Joseph Colaco
Billy Guevara
Michael Bloom
Laura Patiño, City of Houston representative

Attachment: Summary of Public Comments on the Prioritization Framework Proposed Revisions



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SUMMARY OF PUBLIC COMMENTS on the PRIORITIZATION FRAMEWORK PROPOSED REVISIONS

received by the Community Flood Resilience Task Force | verbal and written

Overall, members of the public were firm in that this Prioritization Framework should not be used to reallocate funding from one intended area to another. They underscored the need for a comprehensive plan for flood resilience and the need for a suite of tools to address how new projects are conceived, designed, prioritized, and implemented equitably. Topic-specific comments are as follow:

1. ON USING STRUCTURES OR PEOPLE TO MEASURE PEOPLE BENEFITED

The members of the public overwhelmingly supported counting people instead of structures. They were interested in using census or HCAD data sources to derive the number of people affected, and there was support for capturing benefits to everyone in the structure, not just the first floor.

2. ON INCLUDING OR NOT INCLUDING COMMITTED PARTNERSHIP FUNDING IN THE BENEFITS EFFICIENCY FORMULA.

The community leaned towards not including committed partnership funding in the formula, in support of prioritizing locally-controlled funds. There was a suggestion made to potentially only consider partner funding as a factor in a go/no-go project scenario. Additionally, several members of the public requested regular re-evaluation of the framework to assess whether it was performing as intended.

3. ON THE ASSIGNED VALUES FOR PROJECTS WITHOUT DIRECT BENEFITS TO STRUCTURES IN THE BENEFITS EFFICIENCY METRIC

The public felt that preservation projects should be competitive with projects that reduced flood risk for structures/people and should be scored high. Wetland Mitigation Banks and other maintenance projects should be removed altogether, or scored low. There was also support for Natural Channel Design to be used only on channels that were previously engineered, rather than on currently natural channels.

4. ON THE PROPOSED DATA SET FOR THE LEVEL OF SERVICE PROXY

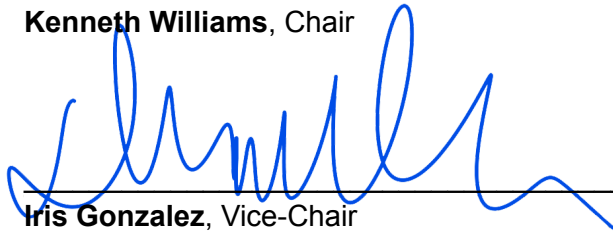
The public was concerned about the FEMA data, and felt that it could be problematic in terms of discriminatory practices that advantaged wealthier and whiter communities over immigrant, undocumented, or low-to-moderate-income (LMI) communities and communities of color.

We, the Executive Committee of the CFRTF, note with concern that a portion of the public comments the Task Force received throughout this process included language that indicated animus against persons or communities of color, including examples of coded language. It is critical both legally and morally for government bodies and officials to act and make decisions in a way that does not discriminate, regardless of public support for a policy that has a discriminatory effect.

Thank you,



Kenneth Williams, Chair



Iris Gonzalez, Vice-Chair



Yasmeen Dávila, Secretary